

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**BRYNNE SOUKUP**  
**Plaintiff**

**v.**

**FRONTIER AIRLINES, INC. and**  
**FLIGHT SERVICES & SYSTEMS, LLC**  
**Defendants**

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**CIVIL ACTION NO. 1:20-CV-648-RP**

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
WITHIN WHICH TO FILE A RESPONSIVE PLEADING**

NOW INTO COURT, comes Defendant, Flight Services & Systems, LLC, reserving any and all defenses and objections including any and all jurisdictional defenses, who respectfully requests an extension of time of thirty (30) days, or until October 7, 2020, to respond to Plaintiff's First Amended Complaint and Jury Demand upon showing that:

1. On July 21, 2020, Plaintiff filed her First Amended Complaint and Jury Demand naming for the first time Flight Services & Systems, LLC ("FSS") as a defendant.

2. As basis for her complaint, Plaintiff alleges that Defendant, Frontier Airlines, Inc. and FSS are joint employers, and Plaintiff alleges violations of the Texas Commission on Human Rights Act ("TCHRA"), TEX. LAB. CODE §§ 21.051 and 21.055, Title VII of the Civil Rights Act of 1964, as amended ("Title VII").

3. FSS's registered agent was served on or about August 17, 2020.

4. Pursuant to Fed. R. Civ. Proc. 12(a), FSS currently has 21 days, or until September 7, 2020, to file a responsive pleading.

5. Given circumstances caused by COVID-19, both FSS's and undersigned counsel's operations have been impacted and suffered interruptions and delays.

6. Additionally, trial and lead counsel for FSS is currently on medical (maternity) leave.

7. Given lead counsel's current status on medical (maternity) leave as well as circumstances and delays caused by COVID-19, FSS respectfully represents that both FSS and its counsel require additional time to investigate Plaintiff's allegations and to file a responsive pleading.

8. Therefore, FSS respectfully requests an additional 30 days, or until October 7, 2020, to file a responsive pleading.

9. FSS avers that this is its first request for an extension of any kind, that its request will not delay any pre-trial or trial deadlines, and that its request is made in good faith and not for any improper purpose.

10. Counsel for Plaintiff has been contacted and does not oppose the requested 30-day extension of time.

WHEREFORE, Defendant, Flight Services & Systems, LLC, prays that this Motion be granted and that Flight Services & Systems, LLC be given an extension of time of an additional thirty (30) days, or until October 7, 2020, to file responsive pleadings to Plaintiff's First Amended Complaint and Jury Demand.

Respectfully submitted,

/s/ H. Michael Bush

H. Michael Bush (Tex. Bar. No. 24054296)

**CHAFFE McCALL, L.L.P.**

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*Counsel for Flight Services & Systems, LLC*

**CERTIFICATE OF CONFERENCE**

I certify that on August 19 2020, Counsel for FSS conferred with Plaintiff's Counsel via telephone wherein Plaintiff's Counsel advised that Plaintiff was unopposed to Defendant's request for a 30-day extension of time to file a responsive pleading.

/s/ H. Michael Bush

**CERTIFICATE OF SERVICE**

I do hereby certify that, on this 20th day of August, 2020, I filed a copy of the foregoing with the Clerk of Court utilizing the Court's ECF system resulting in a true and correct copy of same being served upon counsel of record for all parties to this proceeding.

/s/ H. Michael Bush

